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## OSBORN LAW P.C.

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April 20, 2023

APPLICATION GRANTED

on, Katharine H. Parker, U.S.M.J. 4/25/202

## **VIA ECF**

Honorable Katherine H. Parker United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Tavarez v. Commissioner of Social Security

Civil Action No. 1:22-cv-09656-KHP

Dear Judge Parker,

We write on behalf of our client, Gloria M. Tavarez, to request additional time to file her motion for judgment on the pleadings which is currently due on April 22, 2023 per the Court's November 16, 2022 Scheduling Order. This is the plaintiff's first request for an extension.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: June 6, 2023;
- Defendant to file its response to plaintiff's motion/cross motion on or before: August
   7, 2023; and
- Plaintiff to file her reply, if any, on or before: August 28, 2023.

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Candace Marie Brown Casey, Esq. (by ECF)